

September 18, 2008

VIA ECFS

Marlene H. Dortch, Esquire
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

**Re: US Cable of Coastal-Texas, LP
Annual Customer Proprietary Network Information Certification
Calendar Year 2007
EB Docket No. 06-36
Request for Confidentiality**

Dear Ms. Dortch:

US Cable of Coastal-Texas, LP (“US Cable”), by its attorneys and pursuant to Section 0.459 of the Commission’s rules,¹ hereby requests that the Commission afford confidential treatment to the attached customer proprietary network information (“CPNI”) certification being filed on behalf of US Cable for calendar year 2007.

US Cable requests confidentiality on two grounds. First, public disclosure of the CPNI certification would give data brokers valuable information they could use in their attempts to defeat US Cable’s security mechanisms and safeguards. Second, much of the information provided in the certification, including information concerning US Cable’s data security procedures and customer complaints is proprietary, nonpublic information that is commercially valuable and the public disclosure of which would subject US Cable to serious competitive harm. Each of these grounds is sufficient under Section 0.457(d) of the Commission’s rules² to maintain the confidentiality of the CPNI certification.

¹ 47 C.F.R. § 0.459.

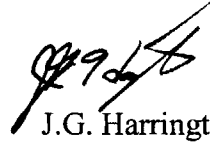
² 47 C.F.R. § 0.457(d).

Marlene H. Dortch
September 18, 2008
Page 2 of 2

For these reasons, US Cable requests that the Commission maintain the confidentiality of US Cable's CPNI certification.

Please inform me if any questions should arise in connection with this request.

Respectfully submitted,



J.G. Harrington

Counsel to US Cable of Coastal-Texas, LP

cc (w/attachment): Enforcement Bureau
 Best Copy and Printing

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for US Cable of Coastal-Texas, L.P.

Date filed: September 18, 2008

Name of company covered by this certification: US Cable of Coastal-Texas, L.P.

Form 499 Filer ID: 825034

Name of signatory: Michael H. Morris

Title of signatory: Vice President

I, Michael H. Morris, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying Statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

US Cable of Coastal-Texas, L.P.

By: 

Michael H. Morris, Vice President

Compliance Statement

The following statement is provided pursuant to 47 U.S.C. §64.2009(e) to explain how the operating procedures of US Cable of Coastal-Texas, L.P. (US Cable) on behalf of itself and its affiliates listed on the CPNI Certification ensure compliance with the applicable rules affecting use of customer proprietary network information.

US Cable policies and procedures to meet the CPNI guidelines include:

Company-Wide Training:

- All employees and contractors with access to CPNI must go through CPNI training prior to accessing CPNI. US Cable tracks employee compliance and requires all contractors to certify that their employees shall comply with all CPNI requirements.
- All new hires who use CPNI information for sales or marketing activities must go through the training course prior to accessing or using CPNI.
- All employees with access to CPNI are required to review CPNI training on an annual basis and following any significant changes in the law occur. US Cable legal department will notify individual Company markets and departments of any changes in the law that necessitate additional CPNI training.
- Managers receive customer confidentiality training on an annual basis.
- Managers monitor and coach employees on maintaining customer confidentiality.

Account Protections:

- The services US Cable offers to its customers do not generate call detail records. Other CPNI information may be provided over the phone to known customer representatives.
- Customers who request access in person at a US Cable location are required to present valid photo identification.
- US Cable notifies customers immediately by mail to the address of record whenever an address of record is changed. The notification does not reveal the changed information.

Marketing Safeguards:

- US Cable Marketing Director approves all direct marketing to ensure compliance with the CPNI rules.

- The US Cable Marketing Department does not use customer CPNI for sales and marketing purposes and has safeguards to prevent cross-product information sharing that would be in violation of CPNI rules.
- US Cable Marketing Department does not sell customer lists to outside sources.
- If, in the future, US Cable does use CPNI for sales and/or marketing campaigns, it shall maintain records of all sales and marketing campaigns that use CPNI.
- US Cable maintains records of all instances, if any, where CPNI is disclosed or provided to third parties, or where third parties are permitted access to CPNI. These records are maintained for a minimum of one year.
- US Cable has supervisory review process to ensure compliance with CPNI restrictions when conducting outbound marketing.

Customer Service Safeguards:

- The US Cable training department provides CPNI training to all customer service new hires and to all applicable department employees on an annual basis.
- The services US Cable offers to its Customers do not generate call detail records. Other CPNI information may be provided over the phone to known customer representatives.
- Customer service representative interactions with customers are monitored, and the monitoring includes evaluation of compliance with privacy requirements.

Notification of CPNI Security Breaches:

- US Cable shall notify law enforcement of all breaches of its customers' CPNI pursuant to the procedures and timeframes described in Section 64.2011 of the FCC's rules.
- US Cable shall notify customers of all breaches of their CPNI pursuant to the procedures and timeframes described in Section 64.2011 of the FCC's rules.

Accountability:

- Persons who fail to comply with US Cable CPNI procedures are subject to a disciplinary process that can include dismissal.

Recordkeeping:

- US Cable telephone CPNI policy is maintained by the US Cable Legal Department and is posted on US Cable internal policy database for training and employee policy review purposes.
- US Cable shall maintain for 2 years (minimum) a record of all discovered breaches of CPNI and breach notifications to law enforcement and customers. The records include, to the extent possible, the dates of discovery and notification, a detailed description of the CPNI that was beached, and the circumstances of the breach.

Actions Taken Against Data Brokers in the Past Year

None.

Summary of CPNI Complaints Received in the Past Year

No CPNI complaints received in the past year.